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11 Attorneys for Defendant
12 ENTERCOM CALIFORNIA, LLC

13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION
15

16 DAVID ALAZZAWI,
17 Plaintiff,

18 v.

19 ENTERCOM, a Corporation, ENTERCOM
20 CALIFORNIA, LLC a Corporation; and DOES
1 through 10, inclusive,
21 Defendants.

CASE NO. 2:20-cv-02295-MCE-JDP

**JOINT STIPULATION AND REQUEST
FOR CONTINUANCE OF PRETRIAL
DEADLINES AND ORDER**

Removed: 11-17-2020
Complaint Filed: 09-30-2020
Trial Date: None Set

22
23 Plaintiff David Alazzawi (“Plaintiff”) and Entercom California, LLC (“Defendant”)
24 (collectively, “the Parties”), by and through their undersigned counsel, hereby enter into the
25 following Stipulation and request the Court to extend certain pretrial deadlines, pursuant to
26 applicable Local Rules:

27 ///

28 ///

- 1 1. The Parties have actively litigated this case. The Parties have engaged in extensive
- 2 settlement discussions. The Parties have engaged in written discovery. The deposition of
- 3 Plaintiff has been scheduled November 12, 2021. No trial date has been set at this time.
- 4 2. Good cause exists to continue the pretrial deadlines because the Parties have been unable
- 5 to complete depositions, and may wish to engage in further post-deposition discovery and
- 6 engage in informal resolution discussions. Because no trial date has been set in this
- 7 matter, and the Parties are in agreement, no prejudice will be suffered by the Parties and
- 8 the Court's docket will not be adversely impacted by granting this request.
- 9 3. The Parties hereby stipulate to the following new dates and request the Court to modify
- 10 the scheduling order accordingly:

| <u>Event</u> | <u>Current Date</u> | <u>Proposed New Date</u> |
|---------------------------------|---------------------|--------------------------|
| Fact Discovery Cut-Off | November 17, 2021 | February 15, 2022 |
| Expert Disclosures | January 16, 2022 | April 16, 2022 |
| Supplemental Expert Lists | February 15, 2022 | May 16, 2022 |
| Dispositive Motions | May 16, 2022 | August 14, 2022 |
| Joint Notice of Trial Readiness | March 17, 2022 | June 15, 2022 |

18 Dated: November __, 2021

TOWER LEGAL GROUP P.C.

20 By: _____

JAMES A. CLARK
RENEE P. ORTEGA

Attorneys for Plaintiff
DAVID ALAZZAWI

24 Dated: November __, 2021

JACKSON LEWIS P.C.

26 By: _____

JAMES T. JONES
BAILEY A. McCABE

Attorneys for Defendant
ENTERCOM CALIFORNIA, LLC

ORDER

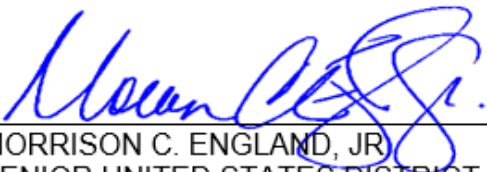
The Court, having considered the foregoing stipulation of the parties, and good cause appearing therefor, makes the following order:

IT IS HEREBY ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS FOLLOW:

| <u>CATEGORY</u> | <u>PRIOR DEADLINE</u> | <u>NEW DEADLINE</u> |
|---------------------------------|------------------------------|----------------------------|
| Fact Discovery Cut-Off | November 17, 2021 | February 15, 2022 |
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| Joint Notice of Trial Readiness | March 17, 2022 | June 15, 2022 |

IT IS SO ORDERED.

Dated: November 12, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE